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ATTORNEYS FOR DEFENDANT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JIAN WANG a/k/a JAMES WANG,

Plaintiff,

- v -

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

11 Civ. 2992 (VB) (JCM)
ECF CASE

**NOTICE OF MOTION TO
ENFORCE THE PARTIES'
WRITTEN SETTLEMENT
AGREEMENT**

PLEASE TAKE NOTICE that upon the accompanying Defendant International Business Machine Corp.'s ("Defendant" or "IBM") Memorandum of Law in Support of Defendant's Motion to Enforce the Parties' Written Settlement Agreement and the Declaration of Dana G. Weisbrod, Esq., with attached exhibits, sworn to on May 22, 2014, the undersigned will move this Court before the Honorable Vincent L. Briccetti at the United States Courthouse, Southern District of New York, 300 Quarropas Street, Room 630, White Plains, New York, 10601, on a date and at a time designated by the Court, for an Order enforcing the parties' written settlement agreement and dismissing Plaintiff's Complaint in its entirety, and for such other and further relief as the Court may deem just and proper.

Pursuant to the Court's May 22, 2014 Order, Plaintiff's answering papers and Defendant's reply papers shall be due on a date set by the Court after disposition of the anticipated motion to withdraw.

Respectfully submitted,

JACKSON LEWIS P.C.
666 Third Avenue, 29th Floor
New York, New York 10017
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Dated: May 23, 2014
New York, New York

By: 

Kevin G. Lauri (KL 8714)
Dana G. Weisbrod (DW 0527)
Jillian L. Hunt (JH 7242)

ATTORNEYS FOR DEFENDANT